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Catch Basin Sediment Data Quality Objective Plan (Split Sampling Between Rainier Commons, Seattle Public Utility and King County)

Former Rainier Brewery Property
3100 Airport Way South
Seattle, Washington
King County

Prepared for:

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Former Rainier Brewery Property

1.0 Site Description and Conceptual Site Model Development

The former Rainier Brewery property is an approximate 4.57-acre parcel located at 3100, Airport Way South, Seattle, WA (the, "Site"). The Site is bound between South Stevens Street to the north, by South Horton Street to the south, by Interstate-5 to the east and Airport Way South to the west. Rainier Commons, LLC (the, "Rainier") owns the Site, which is operated by Ariel Development, Inc. (the, "Ariel"). One-third of the Site is leased to Tully's Coffee. Tully's roasts, grinds, packages, distributes coffee and operates its corporate headquarters on the premises.

The Site was initially developed in the late 1800s as a brewery and functioned in a similar capacity until 1996. The Site has been owned by several entities since its initial development. Separate phases of Site redevelopment has occurred throughout its history. The Site is currently being redeveloped into community mixed use, including but not limited to, residential, commercial and retail space.

Farallon Consulting, Inc. (the, "Farallon") conducted a Phase I Environmental Site Assessment on April 14, 2004. Farallon reported, from their Site reconnaissance, nine (9) pad-mounted electrical transformers at various locations throughout the Site. Farallon also observed oil staining at floor drains adjacent to transformer vaults within several of the buildings and adjacent to abandoned equipment. They did not identify the transformer locations and associated vaults as a Recognized Environmental Condition. Ariel states all of the existing onsite transformers are non-PCB containing.

Suspected and confirmed chemical(s)-of-concern include polychlorinated biphenyls (the, "PCBs") in catch basin sediments. The above suspected chemical(s)-of-concern are formed on the basis of an October 12, 2005 City of Seattle Public Utilities Department (the, "SPU") stormwater pollution prevention inspection at the Site. Preliminary analytical data from the sediment sampling event showed concentrations of PCBs (up to 2,200 mg/kg) in the sediment collected from the following locations: the breezeway trench drain, the catch basins in the tank farm area, and two catch basins in the southwest parking lot adjacent to the building and north of the loading dock.

SPU sampled six (6) sediment sample points for the presence of PCBs at locations discussed above. The analytical results from each location are BNSF CB1-17 mg/kg, BNSF CB2-23 mg/kg, CB 14-175 mg/kg, CB 8-1,340 mg/kg, composite of CB1 through CB6-19.8 mg/kg and CB12-2,200 mg/kg (Figure 1).

On October 4, 2007 KC's Bruce Tiffany and Arnaud Girard, SPU's Beth Schmoyer, VEI's Conrad Vernon, and Rainer Commons' Eitan Alon and John Jack met to discuss potential catch basin sediment containing polychlorinated biphenyl (the, "PCB") that may potentially be discharged from the Site to the Duwamish waterway and wastewater treatment facility located at the Magnolia, Washington treatment facility via KC and SPU storm drains and combined sewer overflows.

VEI compared past SPU PCB analytical results from its October 12, 2005 stormwater pollution prevention catch basin inspection and VEI's catch basin analytical results collected in June 2006 at the Site. VEI showed the concentrations of PCB analytical results, found in the Site catch basin sediments, had decreased from SPU's highest sample concentration of 2,200 mg/kg located in catch basin CB 12 to VEI's CB 12 sediment PCB sample result concentration of non-detect (at a Method Reporting Limit of 0.20 mg/kg) by Advanced Analytical laboratory located in Redmond, WA. SPU and VEI catch basin analytical result trends are presented below.

SPU October 2005 Rainier Commons Catch Basin Sediment Analytical Results (PCB A1254)	**VEI June 2006 Rainier Commons Catch Basin Sediment Analytical Results (PCB A1254)**
BNSF CB-1: 17 mg/kg	BNSF CB-1: 4.3 mg/kg
BNSF CB-2: 23 mg/kg	BNSF CB-2: Non-Detect (ND)
CB-14: 175 mg/kg	CB-14: 0.51 mg/kg
CB-8: 1,340	CB-8: 3.2 mg/kg
CB-1 through CB-6 (composite): 19.8 mg/kg	CB-1: 0.54 mg/kg; CB-2 through CB-6: ND
CB-12: 2,200 mg/kg	CB-12: ND

In an effort to determine whether the PCB source was a result of paint chips released from the facility during painting operations, VEI also collected a paint chip sample. The sample analytical result showed the paint contains 2,300 mg/kg PCB A1254. Based on the paint sample analytical result compared to SPU's catch basin sediment highest PCB analytical result of 2,200 mg/kg, it is highly feasible the paint chips are the source of catch basin sediment impact that may be a result of paint chips migrating from paint chip removal activities to the catch basins during surface run-off precipitation events. Remaining PCB paint on the exterior of the building has been encapsulated through the application of new paint. Moreover, Rainier Commons implemented its PCB Paint O&M Plan in its effort to prevent any future release.

It is Rainier Commons' position that the paint chips are no longer present above regulatory concentration limits in the Site catch basin sediments as the analytical trends show over time. It is Rainier Commons' understanding that KC and SPU are identifying immediately adjacent and hydraulically down gradient catch basin sample locations to the Site. Further, KC and SPU will sample the sediments and storm/wastewater of those identified locations and provide sufficient notice (preferably 10-business days) to VEI before KC's and SPU's sampling event so VEI may be present during split sampling activities, chain of custody and transportation to the selected analytical laboratory(s). Prior to the sampling event VEI requested a copy of KC's and SPU's Field Sampling

Plan and/or any other field work plan, i.e., QA/QC Plan, SOPs, so it can incorporate them into VEI's field work plans for split sampling.

Although an asphalt/concrete cap and building foundations currently cover the Site and the target analytes are contained in the underground stormwater system, human and ecological receptors are potentially at risk through direct sediment contact, ingestion and inhalation (fugitive air emission) pathways. A Stormwater pathway for direct contact, inhalation and ingestion with human and ecological receptors is possible due to physical/chemical transport mechanisms. No documented drinking water wells are on-Site or within the surrounding area. Down-gradient surface water bodies are located at a sufficient distance to possibly be affected by stormwater discharge. Potential receiving surface water includes the Duwamish River (approximately 1.0 mile from the Site) and the Harbor Island East Waterway (approximately .75 miles away from the Site). No reported stormwater discharge to either surface water body from the Site has been documented. Surrounding stormwater system soils near pipe joints connecting to the catch basins may be affected from passive sediment release. Onsite surface water carrying affected sediments after a precipitation event may present a pathway for receptor exposure as well.

The Site is situated above Puget Sound's Vashon till stratum. The regional sediments consist primarily of interlayered and/or sequential deposits of alluvial clays, silts and sands. In the major river valleys of the Puget Sound Region, alluvial deposits lie in and along present streams. The sediments consist of unconsolidated, stratified, clay, silt, and very fine-to-fine sand, and typically contain considerable organic matter.

In May 2003 Farallon Consulting conducted a limited subsurface investigation. The subsurface conditions consisted of gravel from the ground surface to a minimum depth of one (1) to two (2)-feet below ground surface, overlying poorly-sorted silt, sand and gravel, and interbedded sandy silt and silty sand to the maximum depth explored of fifteen (15)-feet below ground surface.

The following bulleted text presents site hydrogeology findings from the Limited Subsurface Investigation conducted by Farallon Consulting, LLC (the, "Farallon") dated May 2003 and Farallon's Phase I Environmental Site Assessment dated April 2004.

- Site soils consist of sand and silt layers with varying amounts of gravel,
- Groundwater is encountered at 8-11 feet below ground surface,
- Groundwater direction is thought to flow to the northwest (however, seasonal conditions affect the flow direction, which has been reported to flow to the north and northeast; URS 2002), and
- Average hydraulic gradient is thought to be low.

Potential off-site chemical-of-concern migration to surface water bodies is unlikely to present a risk via *groundwater* transport due to reported silt and sand soil types of the site and surrounding area, the reported hydraulic conductivity for the area, the geochemical/physical interaction of the chemical(s)-of-concern and surrounding soils, and the down-gradient distance to potential receiving surface water (approximately 1-

mile from Duwamish River and approximately .75 miles away from the Harbor Island East Waterway).

Potential off-site chemical-of-concern migration to surface water bodies (Lower Duwamish River) may be possible via surface water run off to onsite catch basins and then through sewer, combined sewer/storm water and storm water systems.

2.0 Data Quality Objective (DQO) Development

2.1 Site Impact Summary

According to the SPU's stormwater pollution prevention inspection at the Site, PCBs were identified in catch basin sediments. The Field Sampling Plan presents the SPU proposed sample locations.

SPU sampled six (6) sediment sample points for the presence of PCBs at locations discussed above during October 2005. The analytical results from each location are BNSF CB1-17 mg/kg, BNSF CB2-23 mg/kg, CB 14-175 mg/kg, CB 8-1,340 mg/kg, composite of CB1 through CB6-19.8 mg/kg and CB12-2,200 mg/kg (Figure 1).

Rainier Commons June 2006 catch basin sampling event showed reduced PCB concentrations as follows.

SPU October 2005 Rainier Commons Catch Basin Sediment Analytical Results (PCB A1254)	VEI June 2006 Rainier Commons Catch Basin Sediment Analytical Results (PCB A1254)
BNSF CB-1: 17 mg/kg	BNSF CB-1: 4.3 mg/kg
BNSF CB-2: 23 mg/kg	BNSF CB-2: Non-Detect (ND)
CB-14: 175 mg/kg	CB-14: 0.51 mg/kg
CB-8: 1,340	CB-8: 3.2 mg/kg
CB-1 through CB-6 (composite): 19.8 mg/kg	CB-1: 0.54 mg/kg; CB-2 through CB-6: ND
CB-12: 2,200 mg/kg	CB-12: ND

Sediment samples will be collected and analyzed from each of three (3) catch basin locations during this sampling event as grab/composite sediment samples and sediment in-line sampling methodology as described in the SPU Sampling and Analysis Plan (SAP) (Field Sampling Plan).

During the anticipated field work, sediment grab/composite samples will be collected at each identified catch basin end of pipe stream. Samples will be collected at different times as the lines are jetted by SPU. The grab/composite samples will be mixed and collected into a single homogeneous composite sample. Figure 1 of the Field Sampling Plan shows the proposed sediment grab/composite sample locations. Selection of these locations assumes the sediment grab/composite sample locations cover the impacted area(s) of the Site underground stormwater utilities and the samples are at locations hydraulically down-gradient in the drainage system and will therefore, be representative of Site hydraulically up-gradient underground utility conditions.

Composite sediment samples will be collected and analyzed from each location during this sampling event. Sediments from the sample locations will be analyzed for the following constituent(s):

SAMPLE DESIGNATION

Collected Analytical Samples				
Rainier Commons, LLC - Ariel Development			Sample Date:	Week of 1/7/08
Former Rainier Brewery Property				
3100 Airport Way South, Seattle, WA				
Matrix	**Parameters**	**Method**	**TAT (days)**	**Number of Samples per Location**
Catch Basin Sediments	PCBs	EPA 8082	10	1*
Duplicate	PCBs	EPA 8082	10	*

**Each sample location will consist of 1-sample collected as a grab composite sediment sample from a five- (5) point matrix (1-center and 4-corners of each catch basin).*
**One (1) Field Blank sample to be collected*
**One (1)Triplicate samples to be collected*
**One (1) Trip Blank sample*

The Analytical result turn around time is expected to be ten (10) days regarding the aforementioned target analytes. Data reduction, validation and reporting is expected to take an additional three (3) days.

The members of the scoping team will include the Site Assessment Manager (SAM), a field-sampling expert, a chemist, a hydrogeologist, a quality assurance officer and a data validator. The Site Assessment Manager is the decision-maker.

The main elements of the Former Rainier Brewery project area conceptual site model (Figure 1) include the source of contamination (affected media, i.e. sediments), routes of migration, potential receptors, and the type of expected contaminants.

Exposure from on-site sediment/soil chemical-of-concern releases to surface water and air pathways (fugitive dust) is possible. Potential human and ecological receptors may be at risk. Furthermore, receptors may be exposed to contaminants through dermal contact, inhalation and ingestion of sediments/soils. As previously discussed, groundwater contact is unlikely at this site.

The Washington State Department of Ecology's (Ecology) Model Toxic Control Act (MTCA) provides direction regarding the minimum samples necessary that would still provide adequate data quality to support a defensible decision (MTCA), as well as Guidance promulgated under federal statutes 40 CFR 761. There are adequate resources to collect and analyze the envisioned number of samples from the sediment sample locations.

No strict public or regulatory timeframe has been established to complete the sampling event and cleanup of the Site. Ariel's, Ecology's and SPU's corrective action urgency drives project time constraints. The Rainier Commons, LLC has the financial resources to complete the investigation and cleanup, but is motivated to control costs through this investigation (eliminating unnecessary analyte laboratory costs for potential future sediment, soil and groundwater analysis, and future remediation costs).

2.2 Decision Identification

A known release of PCBs in the catch basin sediments of the stormwater system has occurred on the Site from years of business operating activities. This investigation will provide quantitative results concerning analyte types and concentrations; extent of contamination and it will determine which media is affected. Analytical results from this investigation will define future assessment activities and remedial action.

2.3 Decision Inputs

Information needed to resolve future inputs for Site investigation and remedial action decision making include sediment analysis from the identified sampling locations. Potential future sample collection and remedial action will be based on the aforementioned results.

Informational input sources include analytical measurements as identified in the Sampling and Quality Assurance/Quality Control (QA/QC) Plans, the SPU stormwater pollution prevention inspection findings report and previous Rainier Commons' investigation(s).

Contaminant action levels are defined in Ecology's MTCA for soils under Method A cleanup standards (WAC 173-340). Sampling assurance and control techniques are identified in the QA/QC Plan. The QA/QC Plan ensures that the Field Sampling Plan collection results are of the highest quality and are within control parameters. Analytical methods are referenced and presented in Table 1, as well as, the associated laboratory data quality and control objectives. Sampling techniques will follow prescribed EPA Method standard operating procedures (reference Field Sampling Plan).

2.4 Site Boundaries

The investigation domain will focus on SPU identified hydraulicallydown gradient Site catch basin sediments from the Site underground storm water utility piping. Analytical types identified in Section 1 and the locations of the catch basins are assumed to be representative of Site sediment conditions. Sample results from this location will be used to make decisions on potential future investigations and remedial action.

The temporal boundaries include the timeframe within the investigation for which the samples must be collected. Since the study is intended to determine health risks, all sample data will be collected immediately in an effort to provide congruent seasonal data results for future data comparison purposes. Potential future quarterly catch basin sediment sample collection will be conducted under season specific weather conditions. *It is assumed the stormwater system has been contaminated for several years; however, it is expected chemical-of-concern concentrations have dissipated, but will not increase, over the course of this study. Practical constraints associated with collecting catch basin end of pipe grab/composite sampling associated with line jetting operations are expected while sampling.*

SPU will collect decanted vactor truck sediment samples from the SPU identified sample locations post line jetting. Collection of vactor truck samples is a deviation from the SPU sampling plan (attached). SPU has stated the vactor truck will be pressure washed prior to each sample location. Pressure washing does not guarantee the vactor truck is free from previous contamination (residual contamination elimination is not possible to confirm), nor its associated pipes, hoses and other affected equipment. Rainier Commons will conduct split sample collection and analysis from the SPU vactor truck sediments in addition to in-line and end of pipe sediments prior to vactor truck collection. The sample results from the vactor truck sediments will be flagged as not representative of Site conditions and will therefore be eliminated from further consideration by Rainier Commons.

2.5 Decision Rule Development

This investigation is implemented to determine whether downgradient chemical-of-concern types and their respective concentrations are present in the stormwater system. The Site Assessment Manager (SAM), in consultation with Rainer Commons, LLC warrant holders, Ecology and the SPU, has decided to include the aforementioned target compound for inclusion into this study based on what they believe can be reasonably expected from past operations and sampling events. Hydrogeologic data concerning conductivity, permisivity and other parameters will not be collected. Therefore the SAM cannot reasonably ascertain the migration potential of contaminants from catch basin sediments to soil to groundwater and potential transportation off-site. The SAM will reasonably ascertain whether PCB migration from the stormwater system is possible.

The action levels for the site contaminants will be determined by Ecology's MTCA Method A standards.

If any contaminants are found to be present below or above Ecology's MTCA Method A cleanup standards, then there is actual contamination in the sediments. The goal of this sampling is to characterize the levels of PCBs in all of the catch basins and manholes. The concentrations will dictate how the solids must be handled and where they may be disposed. Once the solids have been removed from the catch basins, the lines have been jetted, and the solids disposed, samples must be collected in the future to determine if the lines are being re-contaminated.

2.6 Decision Error Limits

The scoping team has estimated the range for the parameter of interest regarding target compound concentrations to be zero to any concentration above prescribed laboratory EPA method detection limits in the sediments. Any "hit" will require same compound sample collection and analysis at future collection points in the sediments. Three (3) types of decision errors are defined in the following text. The decision error with the most severe consequences is also established below.

Decision error (a) is defined as the analytical results showing a chemical-of-concern that is present in the initial location, but will not be present in any future sediment locations. The consequences of this decision error include the unnecessary costs of additional chemical analysis.

Decision error (b) is defined as; the analytical data present results that are above the MTCA Method A standard when it is not. Again, this error consequence can lead to costly future investigation and remedial action. Treating sediments can be lengthy and costly. A positive consequence of taking unnecessary action is that some environmental improvement may occur by removing very low levels of contaminants even though the improvement may be of little value when compared to the costs.

Decision error (c) is defined as; the opposite of decision errors (a) and (b). Some consequences of this decision error can result in environmental damage; increase future health costs, increased cancer illness and deaths. A positive consequence of this decision error is that resources are conserved. While the resource savings may be of small consequence when weighed against the negative consequences, it is important to consider them here. A complete, balanced picture of the problem can only be developed if both the positive and negative consequences of the decision error are considered. Decision error (c) is the more severe decision error.

Defining the <u>true</u> state of nature for each decision error will be determined upon closer investigation and maintaining acceptable QA/QC parameters. Also, sample population size must be representative of Site conditions. The true state of nature for the more severe decision error will be considered the baseline condition (null hypothesis) and the true nature for the less severe decision error will be the alternative hypothesis.

- Null hypothesis, H_o = The analytical results show that an analyte is not present at this initial location and that the analytical results show concentrations below the MTCA Method A

- Alternative hypothesis, H_a = The analytical results show that an analyte is present and the concentration of analytes are above the MTCA Method A

False positive error equals decision error (a) & (b) and a false negative error equals decision error (c).

2.7 Design Optimization

The SAM (decision-maker) will analyze existing and new data to select the lowest cost sampling design that is expected to meet the DQOs. Existing data from previous investigations is useful in determining contaminant classes and expected concentrations. New data will be generated to determine impact extent and media contamination. A tolerance interval of 95% will be used to make this determination. Sediment sampling may be required in the future with at least three (3) additional sampling events in an effort to determine that there is a 95% probability of identifying residual chemical(s)-of-concern concentrations in the catch basin sediments. In the alternative, sediment analytical results may be considered 95% probable based on the scoping team's knowledge of past practices on the site.

Figures and Tables

TABLE 1

ANALYTICAL METHODS AND QC GUIDELINES

Sampling Guide

Analysis	SpecificMethod	Container	Preservation	Hold (days)	Amount Needed
Polychlorinated Biphenyls by EPA Method 8082 in Soil					
8082 PCB Only	EPA 8082	Glass jar w/PTFE seal	Store cool at 4°C	14	250 grams
Polychlorinated Biphenyls by EPA Method 8082 in Wipe					
8082 PCB Only	EPA 8082	Glass jar w/PTFE seal	Store sealed at STP	14	one wipe in Hexane

Analytical Method Details

					Surr.	DUP	Matrix Spike		Blank Spike		
Method	Analyte	MDL	MRL	Units	%R	RPD	%R	RPD	%R	RPD	CAS #
Polychlorinated Biphenyls by EPA Method 8082 in Soil											
EPA 8082	Aroclor 1016	2.66	25.0	ug/kg dry wt	-	-	47-134	35	54-125	30	12674-11-2
EPA 8082	Aroclor 1016 [2C]	2.66	25.0	ug/kg dry wt	-	-	47-134	35	54-125	30	12674-11-2
EPA 8082	Aroclor 1221	13.3	50.0	ug/kg dry wt	-	-	-	-	-	-	11104-28-2
EPA 8082	Aroclor 1221 [2C]	13.3	50.0	ug/kg dry wt	-	-	-	-	-	-	11104-28-2
EPA 8082	Aroclor 1232	5.76	25.0	ug/kg dry wt	-	-	-	-	-	-	11141-16-5
EPA 8082	Aroclor 1232 [2C]	5.76	25.0	ug/kg dry wt	-	-	-	-	-	-	11141-16-5
EPA 8082	Aroclor 1242	2.08	25.0	ug/kg dry wt	-	-	-	-	-	-	53469-21-9
EPA 8082	Aroclor 1242 [2C]	2.08	25.0	ug/kg dry wt	-	-	-	-	-	-	53469-21-9
EPA 8082	Aroclor 1248	1.78	25.0	ug/kg dry wt	-	-	-	-	-	-	12672-29-6
EPA 8082	Aroclor 1248 [2C]	1.78	25.0	ug/kg dry wt	-	-	-	-	-	-	12672-29-6
EPA 8082	Aroclor 1254	1.49	25.0	ug/kg dry wt	-	-	-	-	-	-	11097-69-1
EPA 8082	Aroclor 1254 [2C]	1.49	25.0	ug/kg dry wt	-	-	-	-	-	-	11097-69-1
EPA 8082	Aroclor 1260	3.80	25.0	ug/kg dry wt	-	-	22-171	35	58-128	30	11096-82-5
EPA 8082	Aroclor 1260 [2C]	3.80	25.0	ug/kg dry wt	-	-	22-171	35	58-128	30	11096-82-5
EPA 8082	Aroclor 1262	1.46	25.0	ug/kg dry wt	-	-	-	-	-	-	37324-23-5
EPA 8082	Aroclor 1262 [2C]	1.46	25.0	ug/kg dry wt	-	-	-	-	-	-	37324-23-5
EPA 8082	Aroclor 1268	6.20	25.0	ug/kg dry wt	-	-	-	-	-	-	11100-14-4
EPA 8082	Aroclor 1268 [2C]	6.20	25.0	ug/kg dry wt	-	-	-	-	-	-	11100-14-4
EPA 8082	TCX			Surrogate	39-139	-	-	-	-	-	877-09-8
EPA 8082	TCX [2C]			Surrogate	39-139	-	-	-	-	-	877-09-8
EPA 8082	Decachlorobiphenyl			Surrogate	33-163	-	-	-	-	-	2051-24-3
EPA 8082	Decachlorobiphenyl [2C]			Surrogate	33-163	-	-	-	-	-	2051-24-3

Polychlorinated Biphenyls by EPA Method 8082

in Wipe

EPA 8082	Aroclor 1016	0.500	2.00	ug/Wipe	-	-	70-130	25	70-130	25	12674-11-2
EPA 8082	Aroclor 1016 [2C]	0.500	2.00	ug/Wipe	-	-	70-130	25	70-130	25	12674-11-2
EPA 8082	Aroclor 1221	0.500	2.00	ug/Wipe	-	-	-	-	-	-	11104-28-2
EPA 8082	Aroclor 1221 [2C]	0.500	2.00	ug/Wipe	-	-	-	-	-	-	11104-28-2
EPA 8082	Aroclor 1232	0.500	2.00	ug/Wipe	-	-	-	-	-	-	11141-16-5
EPA 8082	Aroclor 1232 [2C]	0.500	2.00	ug/Wipe	-	-	-	-	-	-	11141-16-5
EPA 8082	Aroclor 1242	0.500	2.00	ug/Wipe	-	-	-	-	-	-	53469-21-9
EPA 8082	Aroclor 1242 [2C]	0.500	2.00	ug/Wipe	-	-	-	-	-	-	53469-21-9
EPA 8082	Aroclor 1248	0.500	2.00	ug/Wipe	-	-	-	-	-	-	12672-29-6
EPA 8082	Aroclor 1248 [2C]	0.500	2.00	ug/Wipe	-	-	-	-	-	-	12672-29-6
EPA 8082	Aroclor 1254	0.500	2.00	ug/Wipe	-	-	-	-	-	-	11097-69-1
EPA 8082	Aroclor 1254 [2C]	0.500	2.00	ug/Wipe	-	-	-	-	-	-	11097-69-1
EPA 8082	Aroclor 1260	0.500	2.00	ug/Wipe	-	-	52-140	25	52-140	25	11096-82-5
EPA 8082	Aroclor 1260 [2C]	0.500	2.00	ug/Wipe	-	-	52-140	25	52-140	25	11096-82-5
EPA 8082	Aroclor 1262	0.500	2.00	ug/Wipe	-	-	-	-	-	-	37324-23-5
EPA 8082	Aroclor 1262 [2C]	0.500	2.00	ug/Wipe	-	-	-	-	-	-	37324-23-5
EPA 8082	Aroclor 1268	0.500	2.00	ug/Wipe	-	-	-	-	-	-	11100-14-4
EPA 8082	Aroclor 1268 [2C]			ug/Wipe	-	-	-	-	-	-	11100-14-4
EPA 8082	TCX			Surrogate	40-130	-	-	-	-	-	877-09-8
EPA 8082	TCX [2C]			Surrogate	40-130	-	-	-	-	-	877-09-8
EPA 8082	Decachlorobiphenyl			Surrogate	40-130	-	-	-	-	-	2051-24-3
EPA 8082	Decachlorobiphenyl [2C]			Surrogate	40-130	-	-	-	-	-	2051-24-3